

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

WILFRED RIVERA COLON
LAURA ROSA SANTIAGO BARBOSA

DEBTORS

CASE NO 13-07692 ESL

CHAPTER 13

**DEBTORS' REPLY TO TRUSTEE'S MOTION TO DISMISS
DOCKET NO. 44**

TO THE HONORABLE COURT:

COMES NOW, WILFRED RIVERA COLON and LAURA ROSA SANTIAGO, the Debtors in the above captioned case, through the undersigned attorney, and very respectfully state and pray as follows:

1. The Chapter 13 Trustee filed a *Trustee's Motion to Dismiss*, dated August 03, 2017, Docket No. 44, basically stating that the Debtors are in arrears in their Plan payments in the sum of \$780.00 or three (3) monthly payments of \$260.00, in the above captioned case.

2. The debtors hereby reply to the Trustee's motion stating that they did incur in the Plan arrears as stated by the Trustee in his motion for dismissal. The debtors made three (3) recent payments to cure the aforementioned Plan arrears.

3. The Debtors paid the following payments to the Trustee (after the filing of the Trustee's motion for dismissal dated August 03, 2017) on the following dates:

---August 04, 2017.....	\$260.00
---September 01, 2017.....	\$520.00 (payment made through postal money order #23749340027, 09/01/2017)
Total paid-in	\$780.00

4. However, the Debtors are still in arrears in their Plan payments to the Trustee for one (1) month (August 18/2017) or the sum of \$260.00. The Debtors respectfully request this Honorable Court grant them thirty (30) days as additional time to cure the aforementioned Plan arrear and inform the Court, accordingly. This extension of time to expire on October 12, 2017.

Page - 2-
Debtors' Reply to Trustee's Motion to Dismiss
Case no. 13-07692 ESL13

WHEREFORE, the Debtors respectfully pray this Honorable Court grant the present reply to the Chapter 13 Trustee's motion requesting dismissal for failure to make current Plan payments, docket no. 44, and grant the requested extension of time, in the above captioned case.

I HEREBY CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; and also certify that I have mailed by United States Postal Service copy of this motion to the following non-participant: the Debtors, Wilfred Rivera Colon and Laura Rosa Santiago Barbosa, RR 1 Box 3269 Cidra PR 00739, in the above captioned case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 12th day of September, 2017.

/s/ Roberto Figueroa Carrasquillo
USDC #203614
RFIGUEROA CARRASQUILLO LAW OFFICE PSC
PO BOX 186 CAGUAS PR 00726-0816
TEL 787-744-7699 FAX 787-746-5294
EMAIL: rfigueroa@rfclawpr.com

UNITED STATES POSTAL SERVICE [®]		POSTAL MONEY ORDER	
Serial Number	23749340027	Date	2017-09-14
Pay to	Jose A. Carrion		
Address	P.O. Box 881091		
	Chicago, IL 60688		
Memo	11.97		
Amount	\$520.00		
	Five Hundred Twenty Dollars and 00/100		
	Payable to the order of		
	J. Rivera Colon		
	P.O. Box 3269		
	Chicago, IL 60678		
	076927		
SEE REVERSE WARNING		NEGOTIABLE ONLY IN THE U.S. AND POSSESSIONS	
23749340027		23749340027	

Breakdown for Combined Schedules

Period	Date (Month/Year)	Payment Due	Payment Received	Amount Due
1	10/2013	\$250.00	\$250.00	\$0.00
2	11/2013	\$250.00	\$250.00	\$0.00
3	12/2013	\$250.00	\$250.00	\$0.00
4	1/2014	\$250.00	\$250.00	\$0.00
5	2/2014	\$250.00	\$250.00	\$0.00
6	3/2014	\$250.00		\$250.00
7	4/2014	\$250.00	\$500.00	\$0.00
8	5/2014	\$250.00	\$250.00	\$0.00
9	6/2014	\$250.00	\$250.00	\$0.00
10	7/2014	\$250.00		\$250.00
11	8/2014	\$250.00	\$250.00	\$250.00
12	9/2014	\$250.00	\$250.00	\$250.00
13	10/2014	\$260.00	\$260.00	\$250.00
14	11/2014	\$260.00		\$510.00
15	12/2014	\$260.00	\$260.00	\$510.00
16	1/2015	\$260.00	\$260.00	\$510.00
17	2/2015	\$260.00	\$520.00	\$250.00
18	3/2015	\$260.00		\$510.00
19	4/2015	\$260.00	\$260.00	\$510.00
20	5/2015	\$260.00	\$260.00	\$510.00
21	6/2015	\$260.00	\$260.00	\$510.00
22	7/2015	\$260.00	\$520.00	\$250.00
23	8/2015	\$260.00	\$260.00	\$250.00
24	9/2015	\$260.00	\$260.00	\$250.00
25	10/2015	\$260.00	\$260.00	\$250.00
26	11/2015	\$260.00	\$260.00	\$250.00
27	12/2015	\$260.00	\$260.00	\$250.00
28	1/2016	\$260.00	\$260.00	\$250.00
29	2/2016	\$260.00	\$260.00	\$250.00
30	3/2016	\$260.00	\$260.00	\$250.00
31	4/2016	\$260.00	\$260.00	\$250.00
32	5/2016	\$260.00	\$260.00	\$250.00
33	6/2016	\$260.00		\$510.00
34	7/2016	\$260.00	\$260.00	\$510.00
35	8/2016	\$260.00		\$770.00
36	9/2016	\$260.00	\$260.00	\$770.00
37	10/2016	\$260.00	\$260.00	\$770.00
38	11/2016	\$260.00	\$1,030.00	\$0.00
39	12/2016	\$260.00	\$260.00	\$0.00
40	1/2017	\$260.00	\$260.00	\$0.00
41	2/2017	\$260.00		\$260.00
42	3/2017	\$260.00	\$260.00	\$260.00
43	4/2017	\$260.00	\$260.00	\$260.00
44	5/2017	\$260.00	\$260.00	\$260.00

45	6/2017	\$260.00		\$520.00
46	7/2017	\$260.00		\$780.00
47	8/2017	\$260.00	\$260.00	\$780.00
48	9/2017			\$780.00

Total Delinquent Amount: \$780.00
